

REMARKS

Claims 1-15 are currently pending in the application, of which claims 1, 6, and 12 are independent claims.

Entry of the Remarks is respectfully requested because entry places the present application in condition for allowance, or in the alternative, better form for appeal. In view of the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

Rejections Under 35 U.S.C. §102

Claims 1-3 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,313,889 issued to Song, *et al.* (“Song”). Applicants respectfully traverse this rejection for at least the following reasons.

In order for a reference to anticipate, it must teach and enable each and every element of the claim. Applicants respectfully submit that claim 1, contains the limitation “to substantially minimize a blocking effect.” In contrast, the cited reference, *Song*, does not. The Examiner states that *Song* teaches this element by teaching “a disconnection at point a is repaired” Applicants respectfully direct the Examiner’s attention to page 2 of the specification, ll. 3-5 where the present application indicates that the blocking effect refers, for example, to “the phenomenon that a sensible line is formed on a boundary between blocks each constituting a picture.” Applicants believe that Examiner’s argument for anticipation must have rested on some other understanding of what “blocking effect” referred to. *Song* does not teach “substantial

minimiz[ation of] a blocking effect.” Accordingly, *Song* does not teach at least this element of the claims. Applicants note that the phrase “blocking effect” does not even appear in the text of *Song*.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §102(e) rejection of claims 1-3. Since none of the other prior art of record discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claim 1, and all the claims that depend from them are allowable.

Rejections Under 35 U.S.C. §103

Claim 4 stands rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,313,889 issued to Song, *et al.* (“*Song*”) in view of no other art. Applicants respectfully traverse this rejection for at least the following reasons.

As described above, *Song*, does not teach “to substantially minimize a blocking effect.” In contrast, Claim 4 contains this limitation because it depends from Claim 1. The unsupported assertions by the Examiner as to the knowledge of one of ordinary skill in the art do not remedy this deficiency. Alternatively, *Song* is improper prior art under 35 USC § 103(c) because it was subject to assignment to the same person (Samsung Electronics Co., Ltd.) as the present application at the time the invention was made.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection of claim 4. Since none of the other prior art of record, whether taken alone or in any

combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that dependent claim 4 is allowable.

Rejections Under 35 U.S.C. §103

Claim 5 stands rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,313,889 issued to Song, *et al.* (“Song”) in view of what the Examiner describes only as “Admitted Art.” Applicants respectfully traverse this rejection for at least the following reasons.

As described above, *Song*, does not teach “to substantially minimize a blocking effect.” In contrast, Claim 5 contains this limitation because it depends from Claim 1. What the Examiner characterizes as “Admitted Art” does not remedy this deficiency, based on the Examiner’s explanation of what it is supposed to teach. It is unclear what art the Examiner references, and whether it qualifies as prior art under any statutory provision. Alternatively, *Song* is improper prior art under 35 USC § 103(c) because it was subject to assignment to the same person (Samsung Electronics Co., Ltd.) as the present application at the time the invention was made.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection of claim 5. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that dependent claim 5 is allowable.

Rejections Under 35 U.S.C. §103

Claims 6-12 and 15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,313,889 issued to Song, *et al.* (“Song”) in view of U.S. Patent No. 6,633,359 issued to Zhang, *et al.* (“Zhang”). Applicants respectfully traverse this rejection for at least the following reasons.

As described above, *Song*, does not teach “to substantially minimize a blocking effect.”

In contrast, Claim 6 contains this limitation, Claims 7-11 contain this limitation because they depend on Claim 6, Claim 12 contains this limitation, and Claim 15 contains this limitation because it depends on Claim 12. Thus each of the rejected claims contains this limitation.

Zhang does not remedy this deficiency, because it also does not teach “to substantially minimize a blocking effect.” Alternatively, *Song* is improper prior art under 35 USC § 103(c) because it was subject to assignment to the same person (Samsung Electronics Co., Ltd.) as the present application at the time the invention was made.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection of claims 6-12 and 15. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claims 6 and 12, and all the claims that depend from them are allowable.

Rejections Under 35 U.S.C. §103

Claims 13 and 14 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,313,889 issued to Song, *et al.* (“Song”) in view of U.S. Patent No. 6,633,359 issued to Zhang, *et al.* (“Zhang”) and further in view of U.S. Patent No. 6,700,562 issued to Knapp, *et al.* (“Knapp”). Applicants respectfully traverse this rejection for at least the following reasons.

As described above, *Song*, does not teach “to substantially minimize a blocking effect.” In contrast, Claims 13 and 14 contain this limitation because they depend on Claim 12. Thus each of the rejected claims contains this limitation. *Zhang* does not remedy this deficiency, because it also does not teach “to substantially minimize a blocking effect.” Furthermore, *Knapp* does not remedy the deficiencies of *Song* and *Zhang*, because it also does not teach “to substantially minimize a blocking effect.” Alternatively, *Song* is improper prior art under 35 USC § 103(c) because it was subject to assignment to the same person (Samsung Electronics Co., Ltd.) as the present application at the time the invention was made.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection of claims 13-14. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that dependent claims 13-14 are allowable.

CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,



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